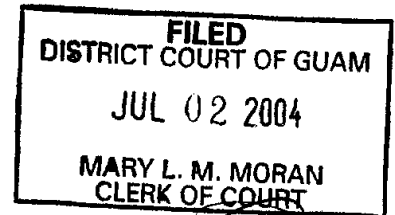


LAW OFFICES OF BRONZE & TANG

A Professional Corporation
BankPacific Building, 2nd Floor
825 South Marine Corp Drive
Tamuning, Guam 96913
Telephone No.: (671) 646-2001
Facsimile No.: (671) 647-7671



Attorneys for Defendant The Hongkong and Shanghai Banking Corporation Ltd.

IN THE DISTRICT COURT OF GUAM

ALAN SADHWANI, LAJU
SADHWANI, and K. SADHWANI'S
INC., a Guam corporation,

Plaintiffs,

v.

HONGKONG AND SHANGHAI
BANKING CORPORATION, LTD.,
et al.,

Defendants.

CIVIL CASE NO. 03-00036

**LETTERS OF REQUEST FOR
TAKING THE DEPOSITION AND
PRODUCTION OF DOCUMENTS
OF HARESH MUKHI IN THE
UNITED ARAB EMIRATES**

**TO: THE APPROPRIATE JUDICIAL AUTHORITY OF THE UNITED ARAB
EMIRATES, THROUGH THE UNITED STATES DEPARTMENT OF STATE,
WASHINGTON, D.C.**

I, Federal Magistrate Judge of the United States District Court of Guam, respectfully
request the assistance of your court with regard to the following matters.

Whereas, a civil proceeding is now pending in the United States District Court of Guam
between certain plaintiffs and defendant.

And whereas it has been represented to the said Court that it is necessary for the purposes of justice and for the due determination of the questions in dispute between the parties in the proceeding that certain persons should be examined as witnesses upon oath. It appears that such witness is a resident within your jurisdiction.

Now I, a federal judge of the United States District Court of Guam, hereby issue this Letter of Request for judicial assistance, in accordance with FRCP 28(b), on the taking of depositions in civil matters, as follows:

1. A claim is now pending in the United States District Court of Guam as follows:
Alan Sadhwani, Laju Sadhwani, K. Sadhwani's, Inc. v. Hongkong and Shanghai Banking Corporation, Ltd., John Doe I through John Doe X, Civil Case No. 03-00036 (U.S. District Court of Guam).

2. The names of the parties to the proceedings, and their representatives, are as follows:

A. Plaintiffs Alan Sadhwani, Laju Sadhwani, and K. Sadhwani's, Inc.

Attorneys: Joaquin C. Arriola
Anita P. Arriola
ARRIOLA, COWAN & ARRIOLA
259 Martyr Street, Suite 201
Hagåtña, Guam 96910
Telephone No.: (671) 477-9730
Facsimile No.: (671) 477-9734

B. Defendant Hongkong and Shanghai Banking Corporation, Ltd.

Attorneys: Jacques G. Bronze
LAW OFFICES OF BRONZE & TANG
BankPacific Building, 2nd Floor
825 South Marine Corp Drive
Tamuning, Guam 96913
Telephone No.: (671) 646-2001
Facsimile No.: (671) 647-7671

Abdul Wahid Al Ulama
AL TAMIMI & COMPANY
Dubai World Trade Centre, 29th Floor
P. O. Box 9275
Dubai, United Arab Emirates
Telephone No.: (9714) 3317090
Facsimile No.: (9714) 3313177

3. The nature of the proceedings for which the evidence is required and all necessary information in regard to the proceedings are as follows:

Plaintiffs Alan Sadhwani, Laju Sadhwani and K. Sadhwani's, Inc. (collectively "Plaintiffs") filed a Second Amended Complaint alleging that HSBC breached its duty of good faith and fair dealing; breached the loan workout agreement; breached the Promissory Note Modification Agreement; committed intentional misrepresentation; breached its fiduciary duty; and breached its duty not to divulge Plaintiffs' confidential banking information. Plaintiffs seek compensatory and punitive damages.

This proceeding is scheduled for trial beginning on October 19, 2004 in the United States District Court of Guam. The discovery deadline (the date for completion of all discovery, including depositions) in the case has been extended to August 17, 2004, pursuant to an order of Court. The evidence sought herein is essential to the trial in this proceeding, is intended to be given at trial, and will be admissible at trial.

4. It is necessary for the purposes of justice and for the due determination of the matters in dispute between the parties that you cause the following witness, who is a resident within your jurisdiction, to be examined and documents be produced. The name and address of the witness is as follows:

A. Mr. Haresh Mukhi
Mayura Khamas Stores L.L.C.
Murshid Bazar
Beira, Dubai, UAE

5. The documents, which the witness should produce at the deposition, is as shown on Exhibit "1" attached and incorporated by reference herein. The subject matter about which the witness is to be examined is as follows:

A. Mr. Haresh Mukhi ~ Mr. Mukhi is an employee or owner of Mayura Khamas Stores, L.L.C.. He has been identified by Plaintiffs as a witness in their Responses and Objections to Defendant's First Set of Interrogatories. Mr. Mukhi is known or believed to have substantial relevant discoverable information. He will be examined on, and amongst other matters, his or his company(s) involvement and knowledge of any negotiations and/or agreements relating to any purported financing of Plaintiffs relating to their loan with HSBC.

Now I, a Magistrate Judge of the United States District Court of Guam hereby request that for the reasons aforesaid and for the assistance of the said Court to serve and/or summon Mr. Haresh Mukhi to produce the list of documents attached as Exhibit "1" and attend at such time and place as you appoint before any notarizing officer of the United States of America in Dubai, U.A.E., or such other person as according to your procedure is competent to take the examination of witnesses, and that such witness to be examined orally and by tape recording or video recording, in the presence of the agents of the Plaintiffs and Defendant or such of them to attend the examination in person or by telephone on due notice given.

And I further request that you will permit the agents of both Plaintiffs and Defendant or such of them as are present in person or by telephone to examine orally upon the subject matter thereof arising out of the answers thereto, said witness as is, after due notice in writing, produced on their behalf, and the other party to cross-examine the said witness orally and the party producing the witness for examination to re-examine him orally. If the agents of Plaintiffs or Defendant participate in the examination of the witness by telephone, such agents shall be provided by facsimile copies of any documents produced by the witness in response to Exhibit 1 prior to the examination.

And I further request that the notarizing officer of the United States of America in Dubai, U.A.E. or you, will cause the evidence of said witness Mr. Haresh Mukhi to be reduced into writing, and all books, documents and things produced on such examination to be duly marked for identification, and that the notarizing officer of the United States of America in Dubai, U.A.E. or you will be further pleased to authenticate such examination by the seal of your Court in such other way as is in accordance with your procedure and to return it together with a note of the charges and expenses payable in respect of the execution of this request through the Defendant from whom the same was received for transmission to the United States District Court of Guam and to return the written evidence and documents produced to me addressed as follows:

United States District Court of Guam
4th Floor, U.S. Courthouse
520 West Soledad Avenue
Hagåtña, Guam 96910

And I further request that you will cause the agents of the parties at the addresses stated above, or in default will cause me, to be informed of the date and place where the examination is to take place.

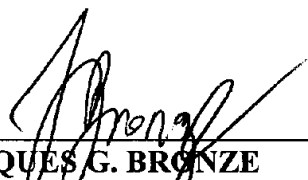
DATED: July 1, 2004

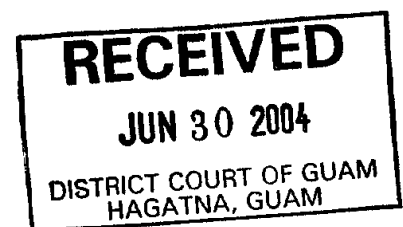

JOAQUIN V.E. MANIBUSAN, JR.

Magistrate Judge, District Court of Guam

Presented By:

LAW OFFICES OF BRONZE & TANG

By: 
JACQUES G. BRONZE
Attorneys for Defendant HSBC



CERTIFICATE OF SERVICE

I, **JACQUES G. BRONZE**, hereby certify that on June 30, 2004, I caused to be served via hand delivery, copy of the **LETTERS OF REQUEST FOR TAKING THE DEPOSITION AND PRODUCTION OF DOCUMENTS OF HARESH MUKHI IN THE UNITED ARAB EMIRATES** to:

Joaquin C. Arriola
Anita P. Arriola
ARRIOLA, COWAN & ARRIOLA
259 Martyr Street, Suite 201
Hagåtña, Guam 96910

Attorneys for Plaintiffs

DATED: June 30, 2004.

LAW OFFICES OF BRONZE & TANG
A Professional Corporation

By: _____


JACQUES G. BRONZE

Attorneys for Defendant HSBC

A Professional Corporation
BankPacific Building, 2nd Floor
825 South Marine Corp Drive
Tamuning, Guam 96913
Telephone: (671) 646-2001
Facsimile: (671) 647-7671

DISTRICT COURT OF GUAM

Defendants.

**EXHIBIT "1" TO LETTERS OF
REQUEST FOR THE DEPOSITION
AND PRODUCTION OF DOCUMENTS
OF HARESH MUKHI**

1. "Documents" means the original and any non-identical copy of all "writings," "recordings," and "photographs" including, but not limited to, letters, telegraphs, cablegrams, telexes, memoranda, notes, records, reports, studies, calendars, diaries, agenda, minutes, books, pamphlets, periodicals, newspaper clippings, graphs, indexes, charts, tabulations, statistical accumulations, ledgers, financial statements, accounting entries, press releases, contracts, affidavits, transcripts, legal documents, records of meetings and conferences, records of conversations, and telephone calls, still photographs, video tapes, motion pictures, tape

recordings, microfilms, punch cards, programs, printouts, lie detector examination records, recordings made through data processing techniques, and the written information necessary to understand and use such films and records.

2. A document "relating to" or that "relates to" any given subject means any document that in whole or in any part constitutes, contains, embodies, reflects, identifies, states, refers to, deals with, or is in any way pertinent to that subject, including without limitation, a document concerning the preparation of other documents.

3. The words "you," or "your," and "yours" refers to Hareesh Mukhi and his predecessors, successors, assigns, agents, attorneys, directors, officers, employees, representatives, and any subsidiary or affiliated entities, and each of them.

DOCUMENTS REQUESTED

1. All documents, records, or papers in your possession, custody, or control pertaining or relating to your attempts to provide a loan or financing to K. Sadhwani's Inc..

2. All documents, records, or papers in your possession, custody, or control pertaining to your attempt to provide a loan or financing to Alan and Laju Sadhwani.

3. All documents, records, or papers in your possession, custody, or control pertaining or relating to K. Sadhwani's Inc..

4. All documents, records, or papers in your possession, custody, or control pertaining to Alan and Laju Sadhwani.

5. All documents, records, or papers in your possession, custody, or control pertaining or relating to your attempts to make loans or provide any financing to any persons or entities in Guam.

6. All documents, records, bank statements, or papers in your possession, custody, or control pertaining or relating to your cash balances or credit facilities for year 2003.

DATED: _____.

LAW OFFICES OF BRONZE & TANG
A Professional Corporation

By: _____
JACQUES G. BRONZE
Attorneys for Defendant HSBC